

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,	)	C.A. NO. 04-11193NG
Plaintiff	)	
	)	
v	)	
	)	
TIMOTHY CALLAHAN, ET AL.	)	
Defendant(s)	)	
	)	

**AFFIDAVIT OF COUNSEL RE PLAINTIFF'S EXHIBITS IN OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

1. I, Michael W. Reilly, am counsel for the Plaintiff in the above entitled matter.
2. Exhibits 1-6 of Plaintiff's Exhibits in Opposition to the Defendants Motion for Summary Judgment are true copies of portions of the transcript of the Motion for New Trial held in Suffolk Superior Court in July and August of 2003.
3. Exhibits 8, 9, 10, 12, 16, 19, 20, 21, 26, 28, 29, 30, 34, 35, 37, 40, and 46 are true copies of portions of the indicated depositions.
4. Exhibits 7, 13, 15, 18, 22, and 27 are copies of affidavits filed in support of the Defendant's Motion for New Trial in Suffolk Superior Court.
5. Exhibits 23, and 24 are copies of portions of the transcript of the Defendant's Criminal Trial in September and October of 1989.
6. Exhibit 11 is a copy of a commendation authenticated by Commissioner Roache at his deposition (P Ex 37, pgs. 18-19).
7. Exhibit 14 is a copy of Exhibit 14 from Tracie Peaks' deposition (see P Ex 8A, Peaks Deposition Vol I, p. 142).

8. Exhibit 17 is a true copy of portions of the certified medical records received from the Carney Hospital in connection with the Motion for New Trial Hearing in the Suffolk Superior Court.
9. Exhibit 25 is a true copy of a newspaper article which appeared in the Boston Globe on May 15, 2003.
10. Exhibits 31, 32 and 33 are true copies of reports produced by the City of Boston in this case and authenticated by Commisioner Francis M. Roache at his deposition (P Ex 38, Roache Deposition, pgs. 23, 33, 36, 51-54).
11. Exhibit 43 is a true copy of the press release discussed by Ralph Martin in his deposition at P Ex 46.
12. Exhibits 44 and 45 are true copies of rulings of Judge Borenstein in the Tarahn Harris case and Judge Volterra in the Christopher Harding case.
13. Exhibit 47 and 48 are true copies of portions of exhibit 206 and 207 from John Daly's deposition with redactions for privacy.

Respectfully submitted,

By His Attorneys,

/s/ Michael Reilly

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